

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

VANIA MOORE,)	
)	
Plaintiff,)	
)	Civil Action No.:
v.)	1:06-cv-1128-WKW-WC
)	
WILLSTAFF CRYSTAL, INC.,)	
d/b/a WILLSTAFF WORLDWIDE)	
)	
Defendant.)	

**JOINT MOTION TO EXTEND WITNESS, DEPOSITION
DESIGNATION AND EXHIBIT LIST DEADLINES**

Plaintiff Vania Moore and Defendant WillStaff Crystal, Inc. d/b/a WillStaff Worldwide (collectively “the Parties”) jointly move this Court for an Order extending the current witness list, deposition designation, and exhibit list deadlines until 30 days before the trial. In support of their motion the Parties state as follows:

1. On February 6, 2007, the Court entered a Uniform Scheduling Order, which included deadlines for the witness list, deposition designations and exhibit list from the parties for November 28, 2007. (Dkt. No. 7).

2. On September 11, 2007 this Court granted Defendant's unopposed motion to extend the dispositive motion and discovery deadlines. (Dkt. No. 15). The Order also noted that "the pretrial conference is continued from December 7, 2007 to April 21, 2008. The trial is continued from January 7, 2008 to May 19, 2008." (*Id.*). The Order did not extend the deadlines for the witness list, deposition designations, and exhibit list.

3. On October 30, 2007, the Court granted the parties joint motion to extend the dispositive motion and discovery deadlines. (Dkt. No. 18). The parties requested the additional extension to allow the parties time to mediate this matter without incurring the costs of additional discovery and filing dispositive motions. (*See* Dkt. No. 17). The mediation is set for December 4, 2007. Dispositive motions are currently due on February 4, 2008 and discovery closes on March 26, 2008.

4. The parties believe and agree that extending the witness list, deposition designations, and exhibit list deadline until 30 days before trial, would best serve the principles of judicial economy and efficiency. Additionally, the extension would allow the parties time to attempt resolution of this matter prior to incurring additional costs.

WHEREFORE, premises considered, the parties request that the Court enter an Order extending the witness list, deposition designations, and exhibit list deadlines in the Scheduling Order until 30 days before trial.

Respectfully submitted,

s/Ethan R. Dettling

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